



February 8, 2023

Benjamin D. Webb, Esq.
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SENT VIA EMAIL

Re: *Zinksy v. Russin et al.*
No. 2:22-cv-547
Plaintiff's Supplemental Responses to Defendant's Request for Production of Documents

Dear Mr. Webb,

Please allow this correspondence to supplement Plaintiff's Response to Defendant Michael Russin's Request No. 1 for Production of Documents. More specifically, Plaintiff's Supplemental Response to Defendant's Request for Production No. 1 is as follows:

A. Documents

1. ZINSKY000784 - ZINSKY000910
2. ZINSKY000911 - ZINSKY001037
3. ZINSKY001038 – ZINSKY001167
4. ZINSKY001168 – ZINSKY001293
5. ZINSKY001294 – ZINSKY001419
6. ZINSKY001420 – ZINSKY001565
7. ZINSKY001566 – ZINSKY001711

B. Video Recordings

1. 10 Referrals	46. JA Renewals	91. Russin Beer Pong	136. Tristan Loyalty
2. 2021 Recognition Meeting	47. Jackson 500k	92. Russin Bloody Post	137. Tristan Party Not College
3. AA 67mo income	48. Jackson 800k	93. Russin Breast Milk	138. Tristan Team Celebration
4. AA Jax	49. Jackson 1099	94. Russin Dell Chant	139. Tristan Warrior
5. AD \$1M Record Week	50. Jackson Dlabik Rindt Wexford	95. Russing Driving	140. Vena AIL Convention
6. AD Andre Record Week	51. Jackson I'm Not Fing Playing	96. Russing F Around Find Out	141. Who They Work For Now
7. AD Apologize to Nobody	52. Jackson Rookie MGA 2021	97. Russin Gilbert	142. Work Schedule

8. AD Brody Simon	53. Jeremiah Warrior Tattoo	98. Russin IV	143. Yocca Arias
9. AD Loyalty	54. Jeremiah RF Takeover	99. Russin Limo	144. Zophin AA
10. AD Recruiting	55. KH AIL	100. Russin Meeting 1099	145. Zophin Arias
11. AD Weekly Income	56. KH Arias	101. Russin Office Car	
12. Agency Meeting	57. KH LI	102. Russing Office Drinking Game	
13. AIL 2019 Convention	58. Lambo Giveaway	103. Russin Office Manager Meeting	
14. AIL 2022 Vegas	59. LDS 2022	104. Russin Office Team Meeting	
15. AIL Company Overview	60. Male Football Meeting	105. Russin Phone Session	
16. AIL Residuals	61. Maria Joe Call Night	106. Russin Pieface	
17. AIL SGA of the Year	62. Maserati Giveaway	107. Russin Saving Careers	
18. AIL Vegas 2022	63. Monday Meetings	108. Russin Simon Britton	
19. AK on College	64. Office Dancing	109. Russin Strip Club	
20. Arias Club	65. Office Dodgeball	110. Russin Tate Women	
21. Arias MMA	66. Office Fighter	111. Russin Wearing Eyeliner	
22. Banned	67. Office Games	112. Russin You Can't Keep a Fing Team	
23. Blake Tomblin Training	68. Office Meeting	113. Russin You Know I Keep it Real	
24. Boxing	69. Party Grindcast	114. RZ Income \$10k/wk	
25. Call Night Dancing	70. Pens Game Leadership	115. Shazier Agency	
26. Call Night	71. People Won't Agree With You	116. Simon Agency Meeting	
27. Dawgcheck Arias Giveaway	72. Real Talk	117. Simon Boys Chant	
28. Dawgcheck Chant Bar	73. Renee Mal	118. Simon Erie Office	
29. Dawgcheck Chant LDS	74. RF 3 Individuals	119. Simon Fly High	
30. Dawgcheck Chant Meeting	75. RF AA Family	120. Simon Mentor Meeting	
31. Dell Grind	76. RF Bribe	121. Simon On Recruiting	
32. Dlabik Taking Souls	77. RF Exec Mgmt	122. Simon Pay the Cost	
33. Dlabik Work Schedule	78. RF Hunger Games	123. Simon RR	
34. Dlabik Office Celebration	79. RF Office Golf	124. Simon Serur Agency	
35. Drinking With Boss	80. RF Race	125. Simon's Story	
36. Dylan Culture Nggr Btch	81. RF Waxing Punishment	126. Sleeping in Office	
37. Dylan Culture Sept 2021	82. Rindt 9-9	127. Sleeper	
38. Everybody Would Be Doin It	83. Rindt 1099	128. Spencer \$45k Contest	
39. Exec Council May 2021	84. Rindt Wolf Wallstreet	129. Spencer Geyer Prize	
40. Growth Bonuses	85. Rudolph RGA	130. Spencer Lambo	
41. HSM First 365	86. Rudolph Story	131. Spencer Rudolph	
42. HSM March Madness	87. Russin Agency Meeting	132. Specer Testimonials	
43. I Hated the Training	88. Russin Apology	133. The Joker	
44. I'm a Psycho	89. Russin Arias Boat Party	134. Tristan Labron	
45. It's Real Money Dawg	90. Russin Arias Studs	135. Tristan Let's Go Baby	

Similar to Plaintiff's Initial Disclosures and initial discovery responses, you will receive a Google Drive link where the above referenced documents and information can be accessed. Please let me know if you have any technical issues accessing these supplemental documents and recorded videos.

The ongoing onslaught of new information and witnesses that I continue to receive on a consistent basis has revealed a myriad of inconsistencies in Jeremiah Russin's testimony as well as your client's pleadings and testimony. As one example, the above referenced information includes photographic evidence of your client engaged in sexual acts with one of his subordinate female agents (which Mr. Russin denied). Similarly, there is droves of evidence of workplace violence, hate speech, drug abuse, sexual harassment, sexual assault, and other legal claims at the hands of Michael Russin and Simon Arias. At best, it makes your client's "story" of "playing an aggressive male character on tv" incredible. At worst, it is evidence that Mr. Russin has perjured himself on more than one occasion. In any case, the evidence also continues to reveal significant inconsistencies between your client's testimony and representations from American Income Life Insurance Company and Arias Agencies.

For these reasons, I intend to conduct further discovery to include additional depositions and third-party subpoenas. Please advise if you are agreeable to a 45-day extension of discovery. If I do not hear back from you by 5:00pm EST on Friday, February 10th, I will proceed with present a Motion to Extend Discovery to Judge Horan in that regard.

Sincerely,

/s/Amy N. Williamson, Esq.